

ATTACHMENT 1

**PROPOSED ORDER GRANTING TWENTY-SECOND OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY TO SUBSEQUENTLY AMENDED CLAIMS**

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to HTA.

**ORDER GRANTING TWENTY-SECOND OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY TO SUBSEQUENTLY AMENDED CLAIMS**

Upon the *Twenty-Second Omnibus Objection (Non-Substantive) of Puerto Rico Highways and Transportation Authority to Subsequently Amended Claims* (“Twenty-Second Omnibus Objection”)² filed by the Puerto Rico Highways and Transportation Authority (“HTA”), dated April 15, 2019, for entry of an order disallowing in their entirety certain claims filed against HTA, as more fully set forth in the Twenty-Second Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Twenty-Second Omnibus Objection and to grant the relief requested therein pursuant to Section 306(a) of the *Puerto Rico Oversight, Management,*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA” and together with the Commonwealth, COFINA, HTA, and ERS, the “Debtors”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Twenty-Second Omnibus Objection.

and Economic Stability Act (“PROMESA”)³; and venue being proper pursuant to Section 307(a) of PROMESA; and due and proper notice of the Twenty-Second Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A attached hereto (collectively, the “Claims to Be Disallowed”), having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Twenty-Second Omnibus Objection is in the best interests of HTA, its creditors, and all the parties in interest; and, upon the record of the hearing held on the Twentieth Omnibus Objection on June 12, 2019, the rulings made therein, and the Court having determined that the legal and factual bases set forth in the Twenty-Second Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Twenty-Second Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors’ right to object to the Remaining Claims is reserved; and it is further

ORDERED that Prime Clerk is authorized and directed to delete the Claims to Be Disallowed from the official claims register in the HTA Title III Case; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

³ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Twenty-Second Omnibus Objection

Twenty-Second Omnibus Objection
Exhibit A - Amended Claims

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	ARROYO CARABALLO, MARIA E URB. PALACIOS REALES 44 CALLE RAVENA TOA ALTA, PR 00953	05/29/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	28869	\$ 12,925.00	ARROYO CARABALLO, MARIA E. URB. PALACIOS REALES #44 CALLE RAVENA TOA ALTA, PR 00953	06/28/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	57904	\$ 12,925.00*
	Reason: Amended and superseded by a later filed Proof of Claim.									
2	CARMEN D. JIMENEZ GANDARA ESTATE CARLOS E. TORRES PO BOX 9659 SAN JUAN, PR 00908-0659	04/23/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	9614	\$ 523,166.67	CARMEN D. JIMENEZ GANDARA ESTATE CARLOS E. TORRES PO BOX 9659 SAN JUAN, PR 00908-0659	07/20/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	161678	\$ 525,247.39
	Reason: Amended and superseded by a later filed Proof of Claim.									
3	FINCA MATILDE, INC. FIDEICOMISO MERCADO RIERA 9166 CALLE MARINA SUITE 117 PONCE, PR 00717	04/23/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	6812	\$ 247,920.00	FINCA MATILDE, INC. 9166 CALLE MARINA PONCE, PR 00717	05/31/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	22994	\$ 7,248,000.00*
	Reason: Amended and superseded by a later filed Proof of Claim.									
4	FINCA PERSEVERANCIA, INC. MARGARITA WILSON 9166 CALLE MARINA PONCE, PR 00717	05/15/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	14920	\$ 145,436.07	FINCA PERSEVERANCIA, INC. MARGARITA WILSON 9166 CALLE MARINA PONCE, PR 00717	06/08/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	35047	\$ 415,436.07*
	Reason: Amended and superseded by a later filed Proof of Claim.									

Twenty-Second Omnibus Objection
Exhibit A - Amended Claims

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
5 AMERINATIONAL COMMUNITY SERVICES, LLC AS SERVICER FOR THE GDB DEBT RECOVERY AUTHORITY, AS TRANSFeree OF GOVERNMENT DEVELOPMENT BANK OF PUERTO RICO ATTN: FRANCISCO DE ARMAS PONCE DE LEON AVE. # 1519 FIRSTBANK BLDG., SUITE 1406 SAN JUAN, PR 00908	05/25/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	29533	\$ 2,355,974,556.98*	AMERINATIONAL COMMUNITY SERVICES, LLC AS SERVICER FOR THE GDB DEBT RECOVERY AUTHORITY, AS TRANSFeree OF GOVERNMENT DEVELOPMENT BANK OF PUERTO RICO ATTN: FRANCISCO DE ARMAS PONCE DE LEON AVE. # 1519 FIRSTBANK BLDG., SUITE 1406 SAN JUAN, PR 00908	06/29/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	151149	\$ 2,300,700,063.92
Reason: Amended and superseded by a later filed Proof of Claim.									
6 RUGG ROZANY, LINDA 42 WAGON WHEEL RD REDDING, CT 06896	04/12/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	7122	Undetermined*	RUGG ROZANY, LINDA 42 WAGON WHEEL RD. REDDING, CT 06896	05/15/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	13753	\$ 25,000.00
Reason: Amended and superseded by a later filed Proof of Claim.									
7 THE WILLIAM & BARBARA HERMAN FAMILY TRUST UAD 07/17/15 BARBARA J. HERMAN & WILLIAM A. HERMAN TTEES 6238 GLIDE AVE WOODLAND HILLS, CA 91367	04/23/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	8324	Undetermined*	THE WILLIAM & BARBARA HERMAN FAMILY TRUST, WAD 07/17/15 BARBARA J. HERMAN & WILLIAM A. HERMAN TTEES 6238 GLIDE AVE WOODLAND HILLS, CA 91367	05/21/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	17716	\$ 31,081.64
Reason: Amended and superseded by a later filed Proof of Claim.									

ANEXO A

Vigésimosegunda Objeción Colectiva
Anexo A: Reclamaciones Enmendadas

RECLAMACIONES A SER DESESTIMADAS

RECLAMACIÓN REMANENTE

NOMBRE	FECHA DE PRESENTACIÓN	NÚMERO DE CASO/DEUDOR	N.º DE RECLAMACIÓN	MONTO DE LA RECLAMACIÓN	NOMBRE	FECHA DE PRESENTACIÓN	NÚMERO DE CASO/DEUDOR	N.º DE RECLAMACIÓN	MONTO DE LA RECLAMACIÓN
1 ARROYO CARABALLO, MARIA E URB. PALACIOS REALES 44 CALLE RAVENA TOA ALTA, PR 00953	05/29/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	28869	\$ 12,925.00	ARROYO CARABALLO, MARIA E. URB. PALACIOS REALES #44 CALLE RAVENA TOA ALTA, PR 00953	06/28/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	57904	\$ 12,925.00*
Base para: Enmendada y reemplazada por una Evidencia de Reclamación presentada posteriormente.									
2 CARMEN D. JIMENEZ GANDARA ESTATE CARLOS E. TORRES PO BOX 9659 SAN JUAN, PR 00908-0659	04/23/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	9614	\$ 523,166.67	CARMEN D. JIMENEZ GANDARA ESTATE CARLOS E. TORRES PO BOX 9659 SAN JUAN, PR 00908-0659	07/20/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	161678	\$ 525,247.39
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Base para: Enmendada y reemplazada por una Evidencia de Reclamación presentada posteriormente.									
4 FINCA PERSEVERANCIA, INC. MARGARITA WILSON 9166 CALLE MARINA PONCE, PR 00717	05/15/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	14920	\$ 145,436.07	FINCA PERSEVERANCIA, INC. MARGARITA WILSON 9166 CALLE MARINA PONCE, PR 00717	06/08/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	35047	\$ 415,436.07*
Base para: Enmendada y reemplazada por una Evidencia de Reclamación presentada posteriormente.									

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NOMBRE	FECHA DE PRESENTACIÓN	NÚMERO DE CASO/DEUDOR	N.º DE RECLAMACIÓN	MONTO DE LA RECLAMACIÓN	NOMBRE	FECHA DE PRESENTACIÓN	NÚMERO DE CASO/DEUDOR	N.º DE RECLAMACIÓN	MONTO DE LA RECLAMACIÓN
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Base para: Enmendada y reemplazada por una Evidencia de Reclamación presentada posteriormente.									
6 RUGG ROZANY, LINDA 42 WAGON WHEEL RD REDDING, CT 06896	04/12/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	7122	Indeterminado*	RUGG ROZANY, LINDA 42 WAGON WHEEL RD. REDDING, CT 06896	05/15/18	Autoridad de Carreteras y Transportación de Puerto Rico 17 BK 03567-LTS	13753	\$ 25,000.00
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Base para: Enmendada y reemplazada por una Evidencia de Reclamación presentada posteriormente.									

* Indica que la reclamación contiene montos por liquidar o indeterminados